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6		Honorable James L. Robart
7		Tionordor varios E. Toodar
8	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON	
9		ATTLE
10	SUSAN CHEN, et al.,	NO. C16-1877 JLR
11	Plaintiffs,	STIPULATED MOTION AND [PROPOSED] ORDER TO DISMISS
12	v. ·	INDIVIDUAL STATE DEFENDANTS KEVIN QUIGLEY
13	NATALIE D'AMICO, et al.,	AND TIMOTHY EARWOOD
		l
14	Defendants.	NOTE ON MOTION CALENDAR OCTOBER 7, 2019
15		OCTOBER 7, 2019
	BY STIPULATION AND AGREEM	OCTOBER 7, 2019 ENT, the Plaintiffs and the Defendants, by and
15 16	BY STIPULATION AND AGREEMS through their respective counsel of record, reque	OCTOBER 7, 2019 ENT, the Plaintiffs and the Defendants, by and
15 16 17	BY STIPULATION AND AGREEMS through their respective counsel of record, requests. 1. All of Plaintiffs' claims, and P	OCTOBER 7, 2019 ENT, the Plaintiffs and the Defendants, by and est the Court grant the following relief:
15 16 17 18	BY STIPULATION AND AGREEMS through their respective counsel of record, requests. 1. All of Plaintiffs' claims, and P	ENT, the Plaintiffs and the Defendants, by and est the Court grant the following relief: laintiffs' Fourth Amended Complaint, as alleged nigley and Timothy Earwood, in their respective
15 16 17 18 19	BY STIPULATION AND AGREEMS through their respective counsel of record, reque 1. All of Plaintiffs' claims, and P against Individual State Defendants Kevin Qu individual and official capacities, shall be dismi	ENT, the Plaintiffs and the Defendants, by and est the Court grant the following relief: laintiffs' Fourth Amended Complaint, as alleged nigley and Timothy Earwood, in their respective
15 16 17 18 19 20	BY STIPULATION AND AGREEMS through their respective counsel of record, reque 1. All of Plaintiffs' claims, and P against Individual State Defendants Kevin Qu individual and official capacities, shall be dismi	ENT, the Plaintiffs and the Defendants, by and est the Court grant the following relief: laintiffs' Fourth Amended Complaint, as alleged nigley and Timothy Earwood, in their respective ssed, in their entirety, with prejudice; and
15 16 17 18 19 20 21	BY STIPULATION AND AGREEMS through their respective counsel of record, reque 1. All of Plaintiffs' claims, and P against Individual State Defendants Kevin Qu individual and official capacities, shall be dismi 2. The dismissal requested above s	ENT, the Plaintiffs and the Defendants, by and est the Court grant the following relief: laintiffs' Fourth Amended Complaint, as alleged nigley and Timothy Earwood, in their respective ssed, in their entirety, with prejudice; and
15 16 17 18 19 20 21 22	BY STIPULATION AND AGREEMS through their respective counsel of record, reque 1. All of Plaintiffs' claims, and P against Individual State Defendants Kevin Qu individual and official capacities, shall be dismi 2. The dismissal requested above s to any party.	ENT, the Plaintiffs and the Defendants, by and est the Court grant the following relief: laintiffs' Fourth Amended Complaint, as alleged nigley and Timothy Earwood, in their respective ssed, in their entirety, with prejudice; and
15 16 17 18 19 20 21 22 23	BY STIPULATION AND AGREEMS through their respective counsel of record, reque 1. All of Plaintiffs' claims, and P against Individual State Defendants Kevin Qu individual and official capacities, shall be dismi 2. The dismissal requested above s to any party. ////	ENT, the Plaintiffs and the Defendants, by and est the Court grant the following relief: laintiffs' Fourth Amended Complaint, as alleged nigley and Timothy Earwood, in their respective ssed, in their entirety, with prejudice; and

1	SIGNED AND STIPULATED TO THI	S 7th day of October, 2019.
2	ROBERT W. FERGUSON	DORSEY & WHITNEY LLP
3	Attorney General	
4	s/ Scott M. Barbara	s/ Shawn Larsen-Bright
5	SCOTT M. BARBARA, WSBA #20885 Assistant Attorney General	SHAWN LARSEN-BRIGHT, WSBA #37066 Attorneys for Plaintiffs Chen and J.L.
6	Attorneys for State Defendants 800 Fifth Ave, Ste 2000	701 Fifth Ave, Ste 6100 Seattle, WA 98104
7	Seattle, WA 98104 Tel: 206-389-2033	Tel: 206-903-8800 Email: larsen.bright.shawn@dorsey.com
8	Email: scott.barbara@atg.wa.gov	
9	OGDEN MURPHY WALLACE, PLLC	MYERS & COMPANY, P.L.L.C.
10		
11	s/ Aaron P. Riensche	s/ Michael David Myers
12	AARON P. RIENSCHE, WSBA #37202 Attorneys for Redmond Defendants	MICHAEL DAVID MYERS, WSBA #22468 Attorneys for Plaintiffs Lian and L.L.
13	901 Fifth Ave, Ste 3500 Seattle, WA 98164	1530 Eastlake Ave E Seattle, WA 98102
14	Tel: 206-447-7000 Email: <u>ariensche@omwlaw.com</u>	Tel: 106-398-1188 Email: <u>mmyers@myers-company.com</u>
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19	[PROPUSED]-ORDER \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
20	IT IS SO ORDERED.	
21	DATED THIS States District Judge	
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1	DECLARATION OF SERVICE	
2	I hereby declare that on this 8th day of October, 2019, I caused to be electronically filed	
3	the foregoing document with the Clerk of the Court using the CM/ECF system, which will also	
4	send notification of such filing to the following parties:	
5	Aaron P. Riensche – ariensche@omwlaw.com	
6	Daniel Shickich - <u>dshickich@omwlaw.com</u> , Geoff Bridgman - <u>gbridgman@omwlaw.com</u>	
7	Attorneys for Defendants D'Amico, Gibson, Wilson and City of Redmond	
8	<u> </u>	
9	T. Augustine Lo — <u>lo.augustine@dorsey.com</u> Court-Appointed Attorneys for Plaintiff Susan Chen, individually and as Litigation GAL for J.L.	
10	Michael D. Myers – mmyers@myers-company.com	
11	Attorney for Plaintiff Naixiang Lian, individually and as Litigation GAL for L.L.	
12	I declare under penalty of perjury that the foregoing is true and correct.	
13	<u>s/ Scott M. Barbara</u> SCOTT M. BARBARA, WSBA No. 20885	
14	Assistant Attorney General 800 5th Ave, Ste 2000	
15	Seattle, WA 98104 Tel: 206-464-7352	
16	Fax: 206-587-4229 Email: scottb2@atg.wa.gov	
17	Eman. <u>scottoz(toatg.wa.gov</u>	
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1	STIPULATED MOT, & 1 ATTORNEY GENERAL OF WASHINGTON	

STIPULATED MOT, &
[PROPOSED] ORDER TO
DISMISS INDIVIDUAL STATE
DEFS. QUIGLEY & EARWOOD
(C16-1877 JLR)

ATTORNEY GENERAL OF WASHINGTON Torts Division 800 Fifth Avenue, Suite 2000 Seattle, WA 98104-3188 (206) 464-7352